

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEBRASKA

FILED
U.S. DISTRICT COURT
DISTRICT OF NEBRASKA

13 JAN 23 PM 5:39

UNITED STATES OF AMERICA,

8:13CR15

OFFICE OF THE CLERK

Plaintiff,

INDICTMENT

vs.

PETER V. BRISTOL,

31 U.S.C. § 5324(a)(1)

31 U.S.C. § 5324(a)(3)

31 U.S.C. §§ 5324(d)(1)

18 U.S.C. § 2

31 C.F.R. § 103.11(gg)

31 U.S.C. § 5317

Defendant.

The Grand Jury Charges that:

COUNTS I THROUGH XII

(STRUCTURING - 31 U.S.C. § 5324(a)(1))

On or about the dates set forth in Counts I through XI below in the District of Nebraska, the Defendant, PETER V. BRISTOL, as described below in Counts I through XII, knowingly and for the purpose of evading the reporting requirements of Section 5313(a) of Title 31, United States Code, and the regulations promulgated thereunder, including Title 31, Code of Federal Regulations, Section 103.11, did cause and attempt to cause a domestic financial institution, to wit: Security National Bank (SNB) to fail to file a report required under Section 5313(a) of Title 31, and any regulation prescribed under any such section:

COUNT	DATE	CURRENCY DEPOSIT AMOUNT(S)	SECURITY NATIONAL BANK ACCT. #
Count I	05/08/09	\$8,620 \$1,460	xxxxx883 xxxxx245
Count II	06/16/09	\$9,922 \$ 400	xxxxx883 xxxxx245
Count III	07/15/09	\$9,900 \$1,364	xxxxx883 xxxxx245

Count IV	10/05/09	\$9,880 \$1,365	xxxxxx883 xxxxxx245
Count V	02/09/10	\$9,940 \$1,600	xxxxxx883 xxxxxx245
Count VI	07/01/10	\$6,650 \$3,583	xxxxxx883 xxxxxx245
Count VII	09/07/10	\$9,975 \$1,400	xxxxxx883 xxxxxx245
Count VIII	09/20/10	\$9,970 \$ 525	xxxxxx883 xxxxxx245
Count IX	02/08/11	\$8,760 \$2,400	xxxxxx883 xxxxxx245
Count X	02/25/11	\$9,800 \$1,800	xxxxxx883 xxxxxx245
Count XI	04/02/11	\$7,166 \$3,791	xxxxxx883 xxxxxx245
Count XII	04/12/11	\$9,870 \$1,363	xxxxxx883 xxxxxx245

All in violation of Title 31, United States Code, Sections 5324 (a)(1) and 5324 (d)(1); and Title 31, Code of Federal Regulations, Section 103.11 (gg), and Title 18, United States Code, Section 2.

COUNT XIII

(STRUCTURING - 31 U.S.C. § 5324(a)(3))

From on or about February 2, 2009, to on or about November 12, 2011, in the District of Nebraska, the Defendant, PETER V. BRISTOL, knowingly and for the purpose of evading the reporting requirements of Section 5313(a) of Title 31, United States Code, and the regulations promulgated thereunder, did structure, assist in structuring, and attempt to structure and assist in structuring, approximately 93 transactions totaling approximately Eight Hundred Seventy-Eight

Thousand Eight Hundred Ninety-Seven Dollars (\$878,897.00) with Security National Bank (SNB), a domestic financial institution.

All in violation of Title 31, United States Code, Sections 5324(a)(3) and 5324 (d)(1); and Title 31, Code of Federal Regulations, Section 103.11(gg), and Title 18, United States Code, Section 2.

FORFEITURE ALLEGATION

1. The allegations of Counts I through XII of this Indictment are realleged and by this reference fully incorporated herein for the purpose of alleging forfeiture to the United States of America pursuant to the provisions of Title 31, United States Code, Section 5317.

2. As a result of the offenses alleged in Counts I through XII herein, PETER V. BRISTOL, shall forfeit to the United States any and all interest he has in all property, real and personal, involved in the offenses alleged in Counts I through XII, and all property constituting or derived from proceeds obtained directly or indirectly as a result of such violation including but not limited to the following:

\$137,953.06 in United States currency

If the above-described forfeitable property, as a result of any act or omission of the Defendant -


- (1) cannot be located upon the exercise of due diligence;
- (2) has been transferred or sold to, or deposited with , a third person;
- (3) has been placed beyond the jurisdiction of the Court;
- (4) has been substantially diminished in value; or
- (5) has been commingled with other property which cannot be subdivided without difficulty;


it is the intent of the United States, pursuant to Title 31, United States Code, Section 5317 to seek

forfeiture of any other property of said Defendant up to the value of the above forfeitable property.


In violation of Title 31, United States Code, Section 5317.

A TRUE BILL:


FOREPERSON


DEBORAH R. GILG
United States Attorney, D.NE.

The United States of America requests that trial of this case be held at Omaha, Nebraska, pursuant to the rules of this Court.


RUSSELL X. MAYER
Assistant United States Attorney